

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission Rules)	WT Docket No. 05-235
To implement WRC-03 Regulations Applicable to)	
Requirements for Operator Licenses in the)	
Amateur Radio Service)	

COMMENTS

Changes to the ITU Radio Regulations adopted on July 5, 2003 (WRC-03) removed the international requirement for administrations to require Morse code proficiency for an amateur radio license. The ITU left the determination for Morse code proficiency to the individual administrations.

As of this date, less than 30 countries have adopted the changes similar to FCC Notice of Proposed Rule Making and Order (NPRM&O) in WT Docket 05-235 (Elimination of Morse code proficiency requirement of 5 WPM for all amateur license classes). Approximately 200 administrations (e.g. Russia, Eastern Asia, Middle East and Eastern Europe) have not revised their requirements for Morse code proficiency.

There are valid points on both sides of the Morse code proficiency debate. Radiotelegraphy communications has been superseded by modern computer-based communications that are faster, more reliable and accurate than radiotelegraphy with a human operator. Unfortunately, recent events have demonstrated that these modern replacements are heavily dependent upon underlying technologies and infrastructures that are less dependable (fragile) than generally reported and assumed.

If the Commission decides to adopt this proposed amendment, I would ask that the Commission review the earlier rulemaking of Industry Canada in this matter. Specifically, Industry Canada adopted a telegraphy endorsement, displayed on the Canadian amateur license, for proficiency in radiotelegraphy (and speed). This permits Canadian amateurs to seek operational privileges in other administrations that still require Morse code proficiency.

The Commission currently administers and issues proficiency endorsements (e.g. ship radar, telegraphy) for the FCC Commercial Operator License. A telegraphy endorsement for the Operator license in the US Amateur Radio Service would permit US amateurs to demonstrate telegraphy proficiency to non-US administrations and governments still requiring Morse code proficiency. This endorsement would eliminate additional paperwork, delays, or further examinations for an amateur wishing to operate within the geographic authority of these administrations.

Respectfully submitted,

Gregory J. Beat
Leader, Network and Telecommunication Practice
Compass, Ltd.
535 E. Diehl Road, Suite 380
Naperville, IL 60563

w9gb@arrl.net